

**REMARKS**

Claims 1-32 now stand in the application, the independent claims having been editorially amended and new claims 11-32 added. Reconsideration of the application and allowance of all claims are respectfully requested in view of the above amendments and the following remarks.

Regarding the request by the examiner for a proper specification, the substitute specification filed on February 13, 2002 includes all of the required section headings, and the Abstract as amended on November 22, 2004 has been amended from the international version so that it complies with U.S. practice. By the above amendments, two background sub-headings have been added and the Brief Description of the Drawings has been amended. If there are any other areas in which the examiner believes amendments are required, he is respectfully requested to point such out so that applicants can address any alleged deficiencies.

The Section 112 rejection stated in paragraphs 3 and 4 of the Office action is respectfully traversed. The phrase noted by the examiner reads “a network for in response to said at least one control signal addressing a memory “ and is clearly describing a network which addresses a memory in response to a control signal. While the claim in its original form is believed clear, it has nonetheless been editorially amended to a form which will hopefully be more satisfactory.

The claim objection stated in paragraph 5 of the Office action is respectfully traversed. The occurrence of a double “at” is not always incorrect, and in this case is contextually and grammatically accurate and clear. The phrase could be written “at one or more memory locations” but such phraseology often results in a claim objection for reciting an indefinite alternative. Thus, it is common in U.S. practice to use the phrase “at least one” to refer to one or more. Stating that information is stored at at least one memory location is a clear and

grammatically correct way of saying that the information is stored at one or more memory locations. The undersigned is unable to think of a clearer way to describe this, but will gladly consider any specific language the examiner may be able to suggest.

The examiner has rejected all of claims 1-10 on the same grounds as in the earlier Office action. Applicants respectfully traverse the rejections for the same reasons as set forth in the response filed November 22, 2004, and further in view of the discussion below, addressing the comments of the examiner in paragraphs 20-24 of the Office action where the examiner has responded to the arguments earlier presented.

The present invention operates such that two different users entering the same control signal can get different responses. In the example most discussed in the specification, if the users are in two locations different enough to warrant different weather forecasts, then entering a control signal asking for a weather report will result in each being provided with different information. This is reflected in the claim language in at least two places, one being the recitation of the signal generator which responds to the control signal from a user by generating a memory address signal “in a user-dependent way,” and the other being the recitation at the end of the claim that the memory provides different information to the user from different memory locations depending on the address signal generated. Thus, according to the claim, the address signal is user-dependent, the retrieved information is address-dependent, and therefore the retrieved information will be user-dependent.

Gupta describes something entirely different from the present invention. The examiner has construed the phrase “in a user-dependent way” to read on the operation of Gupta, but as acknowledged by the examiner, Gupta does not teach the memory as providing different

information to the user from different memory locations depending on the address signal generated.

Ebrahim is concerned with load balancing. In the examples of prior art discussed, e.g., in the paragraph bridging columns 1-2 of that specification, Ebrahim describes a requester requesting “sun.com” and the system binds the “sun.com” name to one of three servers. But the clear intent is that the request can be served identically from any of the three, i.e., the information provided back to the requester will not differ depending on which server is used.

Ebrahim improves on this by considering not only information from the destination (e.g., server load) but also the context of the requester, in choosing the server. However, the end result to the user is not changed. As described at lines 20-22 of column 2, the multiple objects to which the name can be bound are all of the same type. The paragraph at lines 40-48 of column 2 describes simply load balancing and it is clear that the information provided to the requester from any of the different servers will be the same. This is even more clearly described in the paragraph bridging columns 2-3, e.g., discussing the “replication” of resources and the “transparency” to the user.

There is discussion of criteria for name resolution that may involve, e.g., the type of service requested or the location of the requester, e.g., see lines 18-21 of column 3, but a careful reading of the specification shows that this is not teaching what applicants have claimed.

More particularly, when the type of service requested is used as the criteria, that means that that **different** requests (i.e., **different** control signals) are routed to different servers. This is not the provision of different information to two different users who generate the **same** control signal.

As to geographic location, it is common to provide the same information to different users in different locations simply as a way of managing load. There is nothing to suggest that the information will be different if the location is different or if the chosen server is different. The passages at columns 6-7 of Ebrahim noted by the examiner talk about choosing different servers depending on the location of the requester, but there is not a single suggestion that users at two different locations will receive different information because their servers were different.

Turning again to the claims, and claim 1 by example, the claim requires that a memory will provide different information to the user from different memory locations depending on the address signal, and also requires that the address signal be generated from a control signal in a user-dependent way. This means that the information provided to the user will be user-dependent. This is not the case in either of Gupta or Ebrahim, both of which provide the same information to the user from different servers. Accordingly, all of claims 1-10 patentably distinguish over the prior art.

Claims 11-32 Have been added to clarify distinctive aspects of the invention, with claims 11-14 directed to the location dependency as discussed above, and claims 15-20 directed to the time dependency as discussed, e.g., in the paragraphs beginning at the bottom of page 3 and at the bottom of page 5, and elsewhere, in the present specification. Claims 21-32 are replications of claims 11, 13 and 19 but dependent on claims 7-10.

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

Amendment Under 37 CFR 1.111  
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The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,

  
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